

1 James R. Patterson, CA State Bar No. 211102  
2 Jennifer M. French, CA State Bar No. 265422  
PATTERSON LAW GROUP, APC  
3 1350 Columbia Street, Suite 603  
San Diego, CA 92101  
4 Telephone: (619) 756-6990  
Facsimile: (619) 756-6991  
jim@pattersonlawgroup.com  
5 jenn@pattersonlawgroup.com

6 *Attorneys for Plaintiffs and the Class*

7

8

9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11  
12 BUCKEYE TREE LODGE AND SEQUOIA  
VILLAGE INN, LLC, a California limited  
liability company, 2020 O STREET  
13 CORPORATION, INC, D/B/A THE MANSION  
ON O STREET, PROSPECT HISTORIC  
14 HOTEL, and SHILOH MORNING INN, LLC, a  
Oklahoma limited liability company,  
15 individually and on behalf of themselves and all  
others similarly situated,

16  
17 Plaintiffs,

18 vs.

19 EXPEDIA, INC., a Washington corporation;  
20 HOTELS.COM, L.P., a Texas limited  
partnership; HOTELS.COM GP, LLC, a Texas  
21 limited liability company; ORBITZ, LLC, a  
Delaware limited liability company,

22 Defendants.

23

24

25

26

27

28

Case No. 3:16-cv-04721-VC

**CLASS ACTION**

**DECLARATION OF FRED WICKMAN IN  
SUPPORT OF PLAINTIFFS' UNOPPOSED  
MOTION FOR APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEY'S FEES AND  
COSTS, AND INCENTIVE AWARDS**

Date: March 25, 2021  
Time: 2:00 p.m.  
Courtroom: 4, 17th Floor  
Judge: Hon. Vince Chhabria

1 I, Fred Wickman, declare as follows:

2       1. I am the owner of Plaintiff Prospect Historic Hotel. I make this declaration in support of  
 3 Plaintiffs' Unopposed Motion for Approval of Class Action Settlement. If called as a witness, I would  
 4 and could testify to the following:

5       2. Prospect Historic Hotel is located 28 miles from Crater Lake National Park. It is a small  
 6 inn that I run with my wife, Karen Wickman.

7       3. As a Class Representative, I have been very involved in my case against Expedia since I  
 8 became a plaintiff in 2018. I assisted Class Counsel's investigation by discussing my experiences with  
 9 Expedia's false advertisements about the Inn's availability, as well as my perception and understanding  
 10 of the effect of those advertisements on my business and my customers.

11      4. Since I became involved with this action, I regularly spoke with my counsel to stay  
 12 informed of the status of my case and to discuss the next steps.

13      5. I worked with Class Counsel on my discovery requests. I looked for documents and  
 14 provided them to Class Counsel.

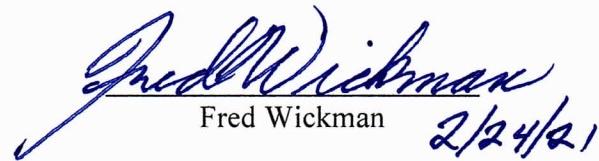
15      6. I met with Class Counsel to prepare for my deposition, which I attended on October 3,  
 16 2018. I faced questioning about the Inn's availability, my experiences with Expedia and similar websites,  
 17 and the false unavailability messages about our Inn that appeared on Expedia's websites.

18      7. I communicated with Class Counsel regarding settlement throughout the litigation and in  
 19 connection with the two mediations and the settlement conference. I have always had the best interests of  
 20 the Class in mind when considering whether to resolve this action. Since I knew it was important to  
 21 fulfill my obligation to Class Members, I evaluated the benefits of the settlement—the injunction that  
 22 will stop Expedia from making false statements about Class Members' availability—to make sure the  
 23 settlement was fair to the Class Members I represent.

24      8. I reviewed and submitted declarations in support of class certification and in support of  
 25 settlement approval.

26      9. I have devoted substantial time to litigate this action to seek a change in Expedia's  
 27 advertising practices. I believe that my dedication and effort have conferred a significant benefit on other  
 28 Class Members and on consumers.

1 I declare under penalty of perjury under the law of the State of California that the foregoing is  
2 true and correct. Executed on February 24, 2021 in Prospect, Oregon.

3   
4 Fred Wickman  
5 2/24/21

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28